

matter was filed in Oklahoma County, which is located within the Western District of Oklahoma.

2. Defendant HHS was served on March 29, 2017. A copy of Plaintiff's Petition is attached hereto as Exhibit 1. The Summons is attached hereto as Exhibit 2.

3. This is a civil action over which this Court has original subject matter jurisdiction in accordance with the provisions of 28 U.S.C. §§ 1331. According to Plaintiff's Petition, her claims arise from the alleged violation of federal law while she was employed by HHS. Specifically, she alleges violations of the Fair Labor Standards Act, 29 U.S.C. §§206, 216(b). See Exhibit 1, Paragraphs 2, 10, 11, 13, 14, 15, 16 and 25-31.

4. While not specifically pled, to the extent Plaintiff intends to bring any state law claims, this Court would have jurisdiction over those claims pursuant to 28 U.S.C. §§1367(a).

5. HHS first received Plaintiff's Original Petition and Representative Action Under the Fair Labor Standards Act and Demand for Jury Trial on March 28, 2017. This Notice of Removal is filed within thirty (30) days of the date HHS first received the initial pleading and citation, and thus, is timely filed under 28 U.S.C. § 1446(b)(1).

6. As required by 28 U.S.C. §1446(d), written notice of this Notice of Removal is being filed this same day with the Clerk for the District Court of Oklahoma County, Oklahoma.

7. In accordance with LCvR 81.2, Fed.R.Civ.P 81 and 28 U.S.C. §1446(a) copies of all process and pleadings previously served upon Defendant, including a copy of the Oklahoma County docket sheet are attached hereto as Exhibits 1-6.

8. There are no motions pending in the Oklahoma County District Court matter, nor are any hearings currently set.

V. CONCLUSION

All conditions and procedures for removal have been satisfied. In conjunction with this Notice of Removal, Defendant is providing the Clerk with: (1) a completed Civil Cover Sheet; (2) copies of all documents filed in the state court, along with a copy of the state court's docket sheet; and (3) a Certificate of Interested Persons, which includes a list of all counsel of record.

WHEREFORE, PREMISES CONSIDERED, Defendant Hospital Housekeeping Systems, LLC, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C. § 1446, files its *Notice of Removal* in accordance with the Court's guidelines, thereby removing this action for trial from the District Court of Oklahoma County, State of Oklahoma, to this Court. Plaintiff is hereby notified to proceed no further in the State Court Case unless by Order of the United States District Court for the Western District of Oklahoma.

Respectfully submitted,

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

By: /s/Gregg J. Lytle

GREGG J. LYTLE

Oklahoma Bar No. 20759

1700 Pacific Avenue, Suite 4545

Dallas, Texas 75201

(214) 754-8755 (Telephone)

(214) 754-8744 (Facsimile)

gregg.lytle@qpwbllaw.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

It is hereby certified that on the 11th day of April, 2016, a true and correct copy of the above and foregoing document has been served via certified mail return receipt requested and via e-mail upon the following counsel of record:

D. Colby Addison

Chris Hammons

Laird Hammons Laird, PLLC

1332 SW 89th Street

Oklahoma City, OK 73159

colby@lhllaw.com

Chris@lhllaw.com

/s/ Gregg J. Lytle

GREGG J. LYTLE